

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) Civil Action No. 24cv1274
)
)
\$250,000 IN UNITED STATES CURRENCY,)
)
)
Defendant.)

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Jill Locnikar, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of \$250,000 in United States currency, pursuant to 18 U.S.C. § 981(a)(1)(C).

2. Jurisdiction is predicated upon 28 U.S.C. § 1345 and § 1355(a). Venue is proper under 28 U.S.C. § 1395 and § 1355(b).

SUMMARY FACTUAL BACKGROUND

3. On June 27, 2023, an Indictment was filed charging Seyed Hamed Razavi Rahmani (“Rahmani”) with one count of conspiracy to engage in a health care fraud scheme in violation of 18 U.S.C. § 1349 (CR. No. 23-143). On March 29, 2024, Rahmani pleaded guilty to the one-count Indictment. The plea agreement in the above case provides that Rahmani will voluntarily forfeit to the United States \$250,000 in United States currency that constitutes or is

derived from proceeds obtained directly or indirectly from the offense or is traceable to property involved in the offense. The plea agreement further provides that Rahmani consents to the filing of the within Complaint for Forfeiture by the United States and entry of a judgment in favor of the United States of \$250,000 in funds related to his participation in the health care fraud scheme. Pursuant to the plea agreement, Rahmani also agreed to waive service of process of the Complaint for Forfeiture.

4. Rahmani was not an owner of Insure Nutrition, but served as the supervisor of the billing department at Insure Nutrition and received salary from Insure Nutrition that was the proceeds of the fraud conspiracy and was tied directly to revenue from the fraud scheme.

5. Seyed Hamed Razavi Rahmani received \$250,000 over the course of his employment that represented the proceeds of fraud perpetrated by Insure Nutrition.

6. By reason of the foregoing, and under the provisions of 18 U.S.C. § 981(a)(1)(C), the receipt of \$250,000 by Seyed Hamed Razavi Rahmani is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant salary; that Judgment of Forfeiture be entered in favor of the United States for the Defendant salary; and that the United States be granted such relief as this Honorable Court may deem just and proper, excluding costs and disbursements of this action.

ERIC G. OLSHAN
United States Attorney

/s/ Jill L. Locnikar
JILL L. LOCNIKAR
Assistant U.S. Attorney
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412)894-7429
(412)644-6995 (fax)
jill.locnikar@usdoj.gov
PA ID No. 85892 (AFF)

VERIFICATION

I am a Special Agent with the Federal Bureau of Investigation, Department of Justice, and one of the case agents assigned to this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of September, 2024.



DIANNE E. SHAFFER, Special Agent
Federal Bureau of Investigation